

# **EXHIBIT A**

## **Consumer Litigation**

Scott+Scott Consumer Practice Group consists of some of the premier advocates in the area of consumer protection. Scott+Scott's Consumer Practice Group has been at the forefront in litigating and securing some of the most significant consumer protection settlements on behalf of its clients, resulting in hundreds of millions of dollars to class members. The Firm's Consumer Practice Group has attorneys dedicated to three primary areas: Data Breach/ Data Privacy Litigation, Healthcare and Pharmaceutical Litigation and Consumer Protection Litigation.

### **Data Breach/ Data Privacy Litigation**

Scott+Scott has extensive experience litigating data privacy and data breach class actions advancing cutting-edge legal theories. The Firm has achieved some of the largest recoveries in this area and currently serves in a leadership capacity in a number of data privacy and data breach class actions, including:

- *In re Equifax, Inc. Customer Data Security Breach Litigation*, No. 1:17-md-02800 (N.D. Ga.)(claims on behalf of financial institutions injured as a result of the 2017 Equifax data breach that exposed the personal and financial information of approximately 150 million U.S. consumers, preliminary approval of settlement valued at \$32.5 million);
- *In re Google Assistant Privacy Litigation*, No. 5:19-cv-04286 (N.D. Cal.)(class action on behalf of consumers alleging privacy violations whereby Google Assistant records and discloses their private, confidential communications without consent);
- *Lopez v. Apple Inc.*, Case No.: 4:19-cv-04577-JSW (N.D. Cal.)(class action on behalf of consumers and their minor children alleging privacy violations by Apple through its Siri application); and
- *In re: American Medical Collection Agency, Inc. Customer Data Security Breach Litigation*, Civil Action No. 19-md-2904 (D.N.J.)(claims on behalf of consumers involving data breach of personal information).

Recently, in settling a class action against The Wendy's Co. involving a breach of personal and financial information, the Court in approving the \$50 million dollar settlement, noted that Scott+Scott and its attorneys demonstrated "very significant experience in these types of class actions and in data breach litigation" and that the attorneys "brought to the table an incredible wealth of knowledge, was always prepared, really was thorough and professional in everything that was provided to the Court."

*First Choice Federal Credit Union v. The Wendy's Co.*, 2:16-cv-00506-NBF-MPK (W.D. Pa.)(Nov. 6, 2019 transcript at 32).

### **Representative Data Breach/ Data Privacy Cases**

Additional data privacy and data breach settlements achieved on by Scott+Scott for their clients include:

- *The Home Depot, Inc., Customer Data Security Breach Litigation*, MDL No. 2583 (N.D. Ga.) (co-lead counsel, \$27.25 million settlement on behalf of financial institutions involving data breach and the theft of the personal and financial information of over 40 million credit and debit card holders);
- *In re Target Corporation Customer Data Security Breach Litigation*, MDL No. 2522 (D. Minn.) (\$59 million settlement on behalf of financial institutions injured by the theft of sensitive payment card information);
- *Greater Chautauqua Federal Credit Union v. Kmart Corporation*, No. 15-cv-02228 (N.D. Ill.) (settlement valued at \$13.4 million on behalf of financial institutions injured by the theft of sensitive payment card information); and
- *WinSouth Credit Union v. Mapco Express, Inc.*, No. 3:14-cv-01573 (M.D. Tenn.) (largest per dollar per card recovery involving payment card data breach brought on behalf of a class of financial institutions).

### **Insurance and Pharmaceutical Litigation**

Scott+Scott represents consumers and health and welfare funds throughout the United States who have been overcharged in connection with their insurance and pharmaceutical transactions. The Firm currently serves in a leadership capacity in a number of insurance and pharmaceutical class actions, including:

- *Sohmer v. UnitedHealth Group Inc.*, No. 18-cv-03191 (JNE/BRT) (D. Minn.) (co-lead counsel, claims on behalf of plan participants alleging overcharge for prescription drug copayments);
- *Negron v. Cigna Corporation*, No. 3:16-cv-1702 (WWE) (D. Conn.) (chair of executive committee, claims on behalf of plan participants alleging overcharge for prescription drug copayments);
- *Forth v. Walgreen Co, Inc.*, No. 1:17-cv-02246 (N.D. Ill.) (class action on behalf of consumers and third party union benefit funds alleging unlawful overcharges for medically necessary prescription drugs);
- *Stafford v. Rite Aid Corporation*, 3:17-cv-1340-AJB-JLB (S.D. Cal.) (class action on behalf of consumers who were overcharged for prescription drug claims);

### **Representative Insurance and Pharmaceutical Cases**

Scott+Scott have significant experience litigating against insurance companies and pharmaceutical manufacturers. The Firm's lawyers have obtained some of the largest settlements in consumer healthcare litigation, including:

- *In re Managed Care Litig.*, MDL No. 1334 (S.D. Fla.) (settlements with Aetna, CIGNA, Prudential, Health Net, Humana, and WellPoint, providing monetary and injunctive benefits exceeding \$1 billion); and
- *In re Prudential Ins. Co. SGLI/VGLI Contract Litigation*, MDL No. 2208 (D. Mass.) (\$40 million settlement was achieved on behalf of a class of military service members and their families who had purchased insurance contracts).

### **Consumer Protection Litigation**

Scott+Scott has been at the forefront in prosecuting consumer protection actions against organizations engaging in unfair practices. The Firm currently serves in a leadership capacity in a number of consumer protection class actions, including:

- *Aquilina v. Certain Underwriters at Lloyd's London*, No. 1:18-cv-00496 (D. Haw.)(representing Hawaii homeowners who placed into insurance excluding lava coverage and suffered devastating losses as a result of the 2018 eruption of Kilauea); and
- *Morris v. Apple, Inc.*, 5:20-cv-04812-EJD (N.D. Cal.)(class action on behalf of consumers who purchased iTunes gift cards under false pretenses and were not refunded the value of the iTunes gift cards).

### **Representative Consumer Protection Cases:**

Over the past decade, the Firm has litigated a number of diverse cases and has fought for rights of consumers to be treated fairly and equitably. The Firm has achieved significant settlements which have protected consumers' rights and recovered substantial monetary benefits, including:

- *The Vulcan Society, Inc. v. The City of New York*, No. 07-cv-02067-NGG-RLM (E.D.N.Y.) (\$100 million settlement and significant injunctive relief was obtained for a class of black applicants who sought to be New York City firefighters but were denied or delayed employment due to racial discrimination);
- *In re Providian Financial Corp. Credit Card Terms Litigation*, MDL No. 1301 (E.D. Pa.) (\$105 million settlement was achieved on behalf of a class of credit card holders who were charged excessive interest and late charges on their credit cards);
- *In re Pre-Filled Propane Tank Marketing & Sales Practices Litigation*, MDL No. 2086 (W.D. Mo.) (\$37 million settlement obtained on behalf of class of propane purchasers who alleged defendants overcharged the class for under-filled propane tanks);
- *Murr v. Capital One Bank (USA), N.A.*, No. 13-cv-1091 (E.D. Va.) (\$7.3 million settlement pending on behalf of class of consumers who were misled into accepting purportedly 0% interest credit card offers); and
- *Gunther v. Capital One, N.A.*, No. 09-2966-ADS-AKT (E.D.N.Y.) (settlement resulting in class members receiving 100% of their damages in case alleging consumers were improperly charged undeliverable mail fees).